

COMMENTS FROM THE
NATURAL RESOURCES DEFENSE COUNCIL (NRDC)

ON THE GLOBALLY HARMONIZED SYSTEM (GHS) OF
CLASSIFICATION AND LABELLING OF CHEMICALS:
OFFICE OF PESTICIDE PROGRAMS
PUBLIC STAKEHOLDER MEETING.

<http://www.epa.gov/oppfead1/international/globalharmon.htm>

OCTOBER 18, 2006

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SUGGESTIONS FOR INCLUDING PUBLIC INTEREST GROUPS

•EPA has provided two documents (draft 7/7/04). One is the implementation planning issues, and the second is a comparison between OPP and the GHS. (Docket OPP-2004-0205)

•EPA should produce a public document that summarized the main points/concerns raised in the public comments submitted to the docket

•EPA should identify primary points raised by public comments, that it would like more advice/discussion on.

•EPA should update its 2004 draft to reflect the most recent version of the UNECE GHS (2005).

•EPA should provide targeted charge questions to be used to solicit opinion from the public

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GENERAL COMMENTS ON GHS

•We strongly support the effort to harmonize and standardize pesticide labels with the global community, and encourage EPA to proceed in a timely manner with these efforts.

•Universal labels will benefit users, manufacturers, transporters, and workers

•Benefits include standard symbols, standard language, and standard definitions for categories.

•Benefits include a streamlined labeling process for producers, which should save time and money.

•Benefits include a streamlined hazard testing process, which should save time and money for producers, as well as for government agencies that review and evaluate data.

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•We support the use of pictograms to provide clear, universal cautionary signals to the user.

•We support the use of the skull-and-crossbones that has proven successful in getting and retaining the attention of users.

•We encourage EPA to continue to work with other agencies, to adopt the GHS.

•The GHS label improvements will need to be supported by training and education programs for pesticide users and workers, and will need to be implemented in a timely manner to allow companies to transition to the new system.

•The World Summit on Sustainable Development (WSSD) set a goal of 2008 for adoption of the GHS program. We strongly support this goal

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SPECIFIC COMMENTS ON GHS

•For acute toxicology categories, we support the GHS two signal words, "danger" and "warning", instead of the current three that includes "caution" in the least toxic category.

•For acute toxicology categories we support the GHS use of the skull and crossbones in diamond symbol for toxic categories 1-3. This will elicit the appropriate attention to the hazard warning.

•For skin corrosion/irritation, we support the GHS use of a corrosion symbol for category 1, but encourage its use for category 2 whereas the current GHS proposal has only an exclamation point for category 2.

•For skin and eye corrosion/irritation we support the GHS signal word "warning" for all chemicals that cause irritation, regardless of whether the irritation may be moderate or severe.

•For skin and eye corrosion/irritation we support the GHS presumption that all skin corrosives also cause severe eye damage. This is a reasonable assumption and is supported by scientific evidence.

•For skin and eye corrosion/irritation we support the GHS use of the symbol in a diamond. This will elicit the appropriate attention to the hazard warning.

•For skin/dermal sensitization, we support the GHS use of the signal word "warning" and symbol. This will elicit the appropriate attention to the hazard warning.

•For aquatic toxicity, we support the EPA continued use of labels for hazards other than aquatic toxicity, such as to bees, birds, and mammals. The protection of pollinators from harmful pesticides is important for agriculture and ecology.

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•We encourage EPA to develop an environmental hazard class to include terrestrial toxicity. Birds are more sensitive than mammalian surrogates (rats) for many pesticides, and this hazard class should include reproductive toxicity as well as acute and chronic oral and dermal toxicity hazard endpoints.

•We support the GHS use of precautionary words or symbols that are triggered by acute hazard for any aquatic organism (fish, invertebrates, aquatic plants, etc.), and are triggered at lower levels of toxicity than under current EPA guidelines.

•We encourage EPA to put chronic toxicity information on the label, and to include this with GHS implementation. This is particularly relevant to endocrine disruption chemicals that may not be acutely toxic, but may be extremely harmful at very low exposures during vulnerable life-stages.

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•EPA should require new labels to list inert ingredients, and should also require toxicity testing for pesticide formulations and not just the active ingredient. Of the over 2,300 substances EPA believes are used as "inerts", over 1700 are classified as "of unknown toxicity", 50 as highly toxic with known carcinogenicity, neurotoxicity, adverse reproductive effects, birth defects or other chronic effects, and 60 as potentially toxic.

•EPA should require public disclosure of health and ecological hazards for both active and inert ingredients. National confidential business information (CBI) policies should not be used to undermine or unfairly limit public access to critical information.

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PROCESS FOR IMPLEMENTATION OF GHS

EPA may want to consider introducing the GHS in phases. If EPA does this, it could collect data that would inform estimates of the cost of implementation of the program.

EPA should issue clear deadlines, including a final deadline, by which revised labels must be in place, and this deadline should not extend unnecessarily.

EPA should establish a stamped approved label for the GHS revisions, to provide clear guidance for producers.

The 2004 OPP White Paper set a policy goal that all label amendments submitted for review during the period 2006-2008 should include the GHS. We strongly support this goal, and ask what implementation has occurred during 2006.

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SUPPLEMENTAL SOURCES OF INFORMATION

Below is the official UN site for GHS:
www.unece.org/trans/danger/publi/ghs

Below is the site on GHS from U Mass Lowell:
[www. Chemicalspolicy.org/ghs](http://www.Chemicalspolicy.org/ghs)

Also, see the following public comments:
Docket HQ-OPP-2004-0205 (www.regulations.gov)

- comments from California Department of Pesticide Regulation
- comments from Beyond Pesticides
- comments from US Fish and Wildlife Service

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